

AEMO GAS RETAIL MARKET COMPLIANCE QUARTERLY REPORT GAS RETAIL MARKET PROCEDURES

PREPARED BY: AEMO

Introduction

ROLE OF AEMO

For New South Wales (NSW), Australian Capital Territory (ACT), South Australia (SA), Victoria (VIC) and Queensland (QLD) gas retail markets, section 91MB(3) of the National Gas Law (NGL) requires that, if AEMO has reasonable grounds to suspect a breach of the Retail Market Procedures (Procedures), it must, after making such inquiries and investigations as it considers appropriate, make a decision as to whether the breach is a material breach. AEMO must publish that decision and its reasons. AEMO is required to assess the materiality of breaches of the Procedures and if it determines that the breach is material may direct a person suspected of a breach to take remedial action. AEMO is not required to undertake this assessment for breaches of the NGL and National Gas Rules (NGR).

For Western Australia (WA) gas retail market, Chapter 6 of the WA Retail Market Procedures deals with Compliance and Interpretation and places a number of obligations on AEMO. AEMO's role under Chapter 6 of the WA Retail Market Procedures includes:

- To create a Compliance Panel and support that panel¹.
- To make determinations on whether to refer Procedure compliance and interpretation matters to the Compliance Panel.

The Compliance Panel makes all decisions under Chapter 6, except that it may delegate authority to AEMO to make determinations on whether a Procedure breach is material².

PURPOSE

This report includes immaterial breaches identified in the last quarter, i.e. between December 2021 and February 2022. Breaches that have a material impact on market participants, the market as a whole, or end use customers are reported separately.

For WA gas retail market, any breaches that are referred to the Economic Regulation Authority (ERA) or have material impact on any other market participants, the market as a whole, or end use customers are reported separately and are included as a line item in this report for completeness.

VERSION CONTROL

| Version | Release date | Changes |
|---------|---------------|-----------------|
| 1.0 | 18 March 2022 | Initial version |

¹ The Compliance Panel has established the "WA Gas Retail Market Compliance Panel Guidelines" to set out its governance and administrative arrangements, as required by clause 338 of the Procedures. The WA Gas Retail Market Compliance Panel Guidelines are available on the AEMO website (<u>www.aemo.com.au</u>), and should be read in conjunction with the WA Gas Retail Market Compliance Guidelines.

² Clause 343(3) of the WA Retail Market Procedures.

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QUARTERLY REPORT – IMMATERIAL BREACHES

| Date of breach | Market | AEMO/Market participant | Procedures and clause | Summary | Impact |
|-----------------------|--------|----------------------------|--------------------------|---|---|
| 4 December 2021 | QLD | AEMO | 6.10.2(a) of QLD RMP | Description On 4 December 2021, the provision of the network allocation daily (NAD) file for gas day 3 December for the QLD gas retail market to the STTM system was delayed by 17 minutes. This caused a non-compliance with the QLD RMP relating to the timely provision of the NAD file to the STTM system. Cause On 4 December 2021, BMP (basic meter profile) job was unable to run due to a leftover row in the data date range locking the database table. The date lock entry was caused by a database deadlock earlier in the morning at 3AM (AEST) between the MIRN refresh process and another daily job that extracts BMP data to AEMO data warehouse running around the same time. This prevented other jobs dependant on the BMP data including the BMP job from running as a protection mechanism, which caused the delay of the completion of the NAD file processing job. Actions On 4 December 2021, AEMO removed the date lock entry in the database table and re-triggered the BMP job at 10.28AM (AEST). The BMP job completed successfully and the NAD file processing job was re-triggered and completed at 10:47AM. AEMO has rescheduled the daily job that extracts BMP data to AEMO data warehouse to run at a different time from the MIRN refresh process. | Immaterial AEMO's non-compliance with clause 6.10.2(a) of the QLD RMP on 4 December 2021 had no material impact on any other market participants, the market as a whole, or end use customers. AEMO does not run STTM daily prudential on weekends and public holidays. |

| Date of breach | Market | AEMO/Market participant | Procedures and clause | Summary | Impact |
|------------------------|--------|---|--------------------------------------|---|---|
| 20 December 2021 | WA | ATCO Gas Australia Pty Ltd (ATCO) | 152(1)(b) and 229(1) of WA RMP | Description On 20 December 2021, the provision of gate point metering data (GPMD) and the estimate of unaccounted for gas (UUAFG) for gas day 19 December was delayed by 50 minutes. On 21 December, ATCO determined there was a 2.7TJ difference between the actual and estimated GPMD for the ATCO network for gas day 19 December. This is a non-compliance with clauses 152(1)(b) and 229(1) of the WA RMP relating to timely provision of GPMD and UUAFG to AEMO. Cause On 20 December, ATCO detected a failure of the webMethods service due to a data drive missing that was required for the webMethods service to function as a result of a brief network issue. The failure of the webMethods service was detected prior to the required timeframe (11.30AM WST) but was not resolved until after the required timeframe resulting in a 50-minute delay in issuing the GPMD and UUAFG files to AEMO. Actions After the webMethods service issue was resolved, ATCO resubmitted the GPMD and UUAFG files to AEMO at 12.20PM WST. ATCO will implement more advanced monitoring specific to this issue on the server hosting the data drive. This will enable faster resolution should this issue reoccur. | Immaterial On 24 January 2022, AEMO requested participants to provide their feedback on this breach by 7 February. AEMO received feedback from AGL confirming no substantial impact. After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. AEMO to take no further action in relation to this matter. |

| Date of breach | Market | AEMO/Market participant | Procedures and clause | Summary | Impact |
|------------------------|--------|--|--|---|--|
| | | | | Note: AEMO re-calculated user's withdrawals for gas day 19 December using actual data on 21 December, and allocation and reconciliation were revised based on updated user's withdrawals (as per normal process). | |
| 27 December 2021 | WA | Alinta Sales Pty Ltd (Alinta Energy) | 178, 181, 188(1) and 197(2) of WA RMP | Description High swing service volumes were detected for gas day 27 December at the North Metro (1106) and South Metro (1107) subnetworks. AEMO investigated this matter and found that the high swing service volumes were due to mismatch between the pipeline injection and the total user pipeline nomination amount (UPNA). WA gas retail market system (GRMS) did not receive Alinta Energy's user allocation instruction (UAI) and UPNA at 1106 and 1107 sub-networks for gas day 27 December. This contributed to the swing service of 4308.07GJ on 1106 and 4035GJ on 1107 for gas day 27 December, which exceeded the tolerance band. This is a breach of clauses 178 and 181 of WA RMP relating to user obligations to minimise its contribution to swing service, and clauses 188(1) and 197(2) of WA RMP relating to timely provision of UAI and UPNA respectively. Alinta Energy is not aware of any significant impact on customers or on any other retailers. Cause Results of a preliminary investigation by Alinta Energy determined that there was a failure in the usual day-ahead nomination process on 26 December whereby nominations were | Immaterial On 10 January 2022, AEMO requested participants to provide their feedback on this breach by 24 January. AEMO received feedback from AGL confirming no substantive impact. AEMO received feedback from Kleenheat indicated that there had been some financial impacts as a result of the high swing service volumes. Kleenheat noted that this event demonstrates the complexity of swing service mechanism in WA gas retail market and, in its view, highlights that it inappropriately affects market participants. After having regard to the other matters in clause 329(1) of the WA RMP, AEMO has determined that the breach was not material and resolved. |

| Date of breach | Market | AEMO/Market participant | Procedures and clause | Summary | Impact |
|-------------------|--------|----------------------------|--------------------------|---|---|
| | | | | not sent for gas day 27 December, but instead were sent for gas day 26 December in error. <u>Actions</u> Alinta Energy will assess systems and processes relating to the day-ahead nomination, and to make enhancements where possible to prevent a re-occurrence of this type of error. | AEMO to take no further action in relation to this matter. |